

PHILLIP A. TALBERT  
Acting United States Attorney  
KEVIN C. KHASIGIAN  
Assistant U. S. Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700

Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$42,687.68 SEIZED  
FROM WELLS FARGO BANK  
ACCOUNT NUMBER 320-3742212,

APPROXIMATELY \$1,840.42 SEIZED  
FROM WELLS FARGO BANK  
ACCOUNT NUMBER 517-7263489,

APPROXIMATELY \$629.84 SEIZED  
FROM WELLS FARGO BANK  
ACCOUNT NUMBER 532-7107099,

APPROXIMATELY \$143.04 SEIZED  
FROM WELLS FARGO BANK  
ACCOUNT NUMBER 530-4807349,

APPROXIMATELY \$50.08 SEIZED  
FROM WELLS FARGO BANK  
ACCOUNT NUMBER 333-4403940, AND

APPROXIMATELY \$16,566.00 IN  
U.S. CURRENCY,

Defendants.

2:20-MC-00301-WBS-CKD

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimants Pablo Salcedo Jr. and Karina Salcedo (“claimants”), by and through their respective counsel, as follows:

1           1.       On or about September 16, 2020, claimants filed a claim in the administrative forfeiture  
2 proceeding with the Federal Bureau of Investigation with respect to the Approximately \$42,687.68 seized  
3 from Wells Fargo Bank Account Number 320-3742212, Approximately \$1,840.42 seized from Wells  
4 Fargo Bank Account Number 517-7263489, Approximately \$629.84 seized from Wells Fargo Bank  
5 Account Number 532-7107099, Approximately \$143.04 seized from Wells Fargo Bank Account Number  
6 530-4807349, Approximately \$50.08 seized from Wells Fargo Bank Account Number 333-4403940, and  
7 Approximately \$16,566.00 in U.S. Currency, (hereafter “defendant funds”), which were seized on or  
8 about June 18, 2020.

9           2.       The Federal Bureau of Investigation has sent the written notice of intent to forfeit required  
10 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
11 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has  
12 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

13           3.       Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
14 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are  
15 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
16 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
17 That deadline was December 15, 2020.

18           4.       By Stipulation and Order filed December 15, 2020, the parties stipulated to extend to  
19 February 12, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
21 forfeiture.

22           5.       By Stipulation and Order filed February 16, 2021, the parties stipulated to extend to April  
23 13, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
24 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

25           6.       By Stipulation and Order filed April 13, 2021, the parties stipulated to extend to June 11,  
26 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
27 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

28           7.       By Stipulation and Order filed June 11, 2021, the parties stipulated to extend to July 12,

2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

8. By Stipulation and Order filed July 13, 2021, the parties stipulated to extend to September 10, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

9. By Stipulation and Order filed September 10, 2021, the parties stipulated to extend to October 8, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

10. By Stipulation and Order filed October 8, 2021, the parties stipulated to extend to November 8, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

11. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to December 8, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

///

///

///

///

///

///

///

///

///

///

///

12. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture shall be extended to December 8, 2021.

Dated: 11/5/2021

PHILLIP A. TALBERT  
Acting United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney


Dated: 11/5/2021

/s/ Melissa Dougherty  
MELISSA DOUGHERTY  
Attorney for potential claimants  
Pablo Salcedo Jr. and Karina Salcedo

(Signature authorized by phone)

**IT IS SO ORDERED.**

Dated: November 8, 2021

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE